

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. <a href="mailto:dstolz@genovaburns.com">dstolz@genovaburns.com</a> <a href="mailto:dclarke@genovaburns.com">dclarke@genovaburns.com</a> 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Robert J. Stark, Esq. Michael Winograd, Esq. <a href="mailto:dmolton@brownrudnick.com">dmolton@brownrudnick.com</a> <a href="mailto:rstark@brownrudnick.com">rstark@brownrudnick.com</a> <a href="mailto:mwinograd@brownrudnick.com">mwinograd@brownrudnick.com</a> Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801</p> <p>and</p> <p>Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Sharon I. Dwoskin, Esq. <a href="mailto:jjonas@brownrudnick.com">jjonas@brownrudnick.com</a> <a href="mailto:sbeville@brownrudnick.com">sbeville@brownrudnick.com</a> <a href="mailto:sdwoskin@brownrudnick.com">sdwoskin@brownrudnick.com</a> One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
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<p><b>PARKINS LEE &amp; RUBIO LLP</b>  Leonard M. Parkins, Esq.  Charles M. Rubio, Esq.  <a href="mailto:lparkins@parkinslee.com">lparkins@parkinslee.com</a>  <a href="mailto:crubio@parkinslee.com">crubio@parkinslee.com</a>  Pennzoil Place  700 Milan St., Suite 1300  Houston, TX 77002  Tel: (713) 715-1666  <i>Proposed Special Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>MASSEY &amp; GAIL LLP</b>  Jonathan S. Massey, Esq.  <a href="mailto:jmassey@masseygail.com">jmassey@masseygail.com</a>  100 Main Ave. SW, Suite 450  Washington, DC 20024  Tel: (202) 652-4511  Fax: (312) 379-0467  <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>
<p>In Re:   <b>LTL MANAGEMENT, LLC,</b>   Debtor.</p>	<p>Chapter 11   Case No.: 21-30589(MBK)   Honorable Michael B. Kaplan   Hearing: <i>February 15, 2022, at 10:00 a.m.</i></p>

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF  
TALC CLAIMANTS TO DISMISS DEBTOR’S CHAPTER 11 CASE**

**PLEASE TAKE NOTICE**, that *on February 15, 2022 at 10:00 a.m.*, the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC, (“LTL” or the “Debtor”), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of an order dismissing the Debtor’s Chapter 11 case, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing and filed no later than seven (7) days before the hearing with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

Respectfully submitted,

**GENOVA BURNS, LLC**

By: /s/ Daniel M. Stolz .

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*Local Counsel to the Official Committee  
of Tort Claimants of LTL Management, LLC*